

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL; ROBERT N.)
SCHAUFENBUEL; JOHN AND SARAH REED,)
IV; JOHN AND JAN REED, III; AMERICAN)
MASS MEDIA CORPORATION; ROBERTA K.)
CLARK; on behalf of Themselves and All Others)
Similarly Situated)

Plaintiffs,)

v.)

INVESTFORCLOSURES FINANCIAL, L.L.C)
ROI DEVELOPERS; INVESTFORCLOSURES;)
INVESTFORCLOSURES.COM, LLC;)
INVESTFORCLOSURES VENTURES; LLC)
SANDS OF GOLD ESCROW; SANDS OF GOLD;)
ROI FINANCIAL; REALTY OPPORTUNITIES)
INTERNATIONAL ESCROW 23; ROI ESCROW;)
REALTY OPPORTUNITIES INTERNATIONAL)
S. de R.L. de C.V; REALTY OPPORTUNITIES)
INTERNATIONAL; ROI MEXICO; SANDS OF)
GOLD ESTATES; FRANCIS X. SANCHEZ)
aka FRANK SANCHEZ; JAMES D. BOURASSA)
aka JIM BOURASSA; SCOTT D. WESSEL;)
DEANA M. GUIDI; DANIEL E. FITZGERALD)
aka DAN FITZGERALD; SCOTT R. SLAGLE;)
DARCEY L. MARTIN; TOM RODRIGUEZ; and)
JOHN DOES 1-30.)

Defendants.)

Case No. 09-cv-1221
District Judge Leinenweber
Magistrate Judge Nolan

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on Thursday, September 10, 2009, at 10:00 a.m. or as soon thereafter as counsel may appear, I shall appear before the Honorable Judge Nan R. Nolan in Room 1858 of the U.S. District Court located at 219 S. Dearborn Street, Chicago, IL and then and there request hearing on the Defendants Darcey L. Martin, Deana M. Guidi and Tom Rodriguez's Motion to Compel.

Respectfully submitted,

By: /s/Russell W. Baker

Charles A. Dunlop ARCD#6180628

Russell W. Baker ARDC# 6287995

Campion, Curran, Dunlop & Lamb, P.C.

8600 U. S. Hwy 14, #201

Crystal Lake, IL 60012

Attorneys for Defendant Deana Guidi

CERTIFICATE OF SERVICE

I, Russell W. Baker, an attorney, hereby certify that I caused copies of the foregoing Defendants Darcey L. Martin, Deana Guidi and Tom Rodriguez's Motion to Compel to be served upon all persons on the attached Service List, via electronic filing, and via U.S. Post for all persons who are not on the U. S. District Court Electronic filing system, deposited at Crystal Lake, IL, September 8, 2009. A courtesy copy of this motion and all exhibits will be delivered via Federal Express upon the Honorable Judge Nan R. Nolan on September 9, 2009.

/s/ Russell W. Baker

CAMPION, CURRAN, DUNLOP & LAMB, P.C.
Attorneys for Defendant Deana Guidi
8600 U.S. Highway 14, Suite 201
Crystal Lake, IL 60012-2759
(815) 459-8440
Fax (815) 455-8134

SERVICE LIST

Schaufenbuel et al. v. Investforclosures Financial, L.L.C. et al.
Case No. 09-cv-1221

Attorneys for Plaintiffs:

Thurston Law Offices, P.C.
Robert C. Thurston
10469 Bethel Avenue
Huntley, IL 60142

Law Offices of Joel M. Weiner, LLC
Joel M. Weiner
579 N. 1st Bank Drive, Suite 150
Palatine, IL 60067-8102

Attorneys for Defendants:

Investforclosures Financial, LLC
ROI Developers
Investforeclosures
Investforclosures.com, LLC
Investforclosures Ventures, LLC
Sands of Gold
ROI Financial
Realty Opportunities International Escrow 23
ROI Escrow
Francis X. Sanchez aka Frank Sanchez
Hugh C. O'Donnell
Nora C. Elias
Elaine C. Davenport
Sanchez Daniels & Hoffman, LLP
333 West Wacker Drive, Suite 500
Chicago, IL 60606

Scott D. Wessel
1828 Sebastian
Woodstock, IL 60098

Daniel E. Fitzgerald aka Dan Fitzgerald
31770 N. Pineview Blvd
Lakemoor, IL 60051

James D. Bourassa aka Jim Bourassa
254 Gregory M. Sears Drive
Gilberts, IL 60136

Scott R. Slagle
38W512 McQuire Place
Geneva, IL 60134